

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DICKINSON WRIGHT, PLLC,)	
)	No. 16-CV-03969
Plaintiff,)	
)	Hon. John Robert Blakely
vs.)	
)	
MCZ DEVELOPMENT CORP.,)	
SHEFFIELD DEVELOPMENT PARTNERS, LLC,)	
GOLDEN CANYON PARTNERS, LLC,)	
FLORENCE DEVELOPMENT PARTNERS, LLC,)	
)	
Defendants.)	

MOTION TO EXTEND TIME TO ANSWER OR OTHERWISE PLEAD

NOW COME Defendants MCZ Development Corp., Sheffield Development Partners, LLC, Golden Canyon Partners, LLC, and Florence Development Partners, LLC (“Defendants”), by and through their attorneys, and pursuant to Rule 6 of the Federal Rules of Civil Procedure, respectfully request an extension of time until July 18, 2016, for Defendants to answer or otherwise plead. In support of this motion, Defendants state as follows:

1. Plaintiff initiated this cause of action on April 4, 2016. (Dkt. 1).
2. Plaintiff sent Defendants requests to waive service on or about April 8, 2016.
3. On April 22, 2016, Counsel for Defendants forwarded to Plaintiff’s counsel the signed waiver forms.
4. On June 3, 2016, Plaintiff filed its Motion for Leave to File First Amended Complaint. (Dkt. 9). Defendants consented to the motion.
5. On June 6, 2016, this Honorable Court granted Plaintiff’s Motion for Leave to File First Amended Complaint. The Court ordered Defendants to answer or otherwise plead by

June 27, 2016. The Court also directed the parties to file their joint initial status report by July 12, 2016, and set this case for initial status conference on July 19, 2016. (Dkt. 13).

6. On June 8, 2016, Plaintiff filed its First Amended Complaint. (Dkt. 14).

7. Through this motion, Defendants seek an extension of 21 days within which to answer the First Amended Complaint or otherwise plead, which will make Defendants' answer or responsive pleading due on July 18, 2016.

8. Defendants bring this motion in good faith and for good cause shown, and not to delay these proceedings.

9. Defendants' counsel has communicated with Plaintiff's counsel regarding this motion. Plaintiff's counsel has indicated that they have no objection to this motion.

WHEREFORE, Defendants respectfully request that this Honorable Court grant the instant Motion to Extend Time for Defendants to Answer or Otherwise Plead to July 18, 2016. Defendants also respectfully request that this Honorable Court reschedule the initial conference, and extend the date for filing the joint status report.

Dated: June 22, 2016

Respectfully submitted,

By: /s/ Jeffrey J. Asperger

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Counsel for Defendants

CERTIFICATE OF SERVICE

As an attorney of record in this matter, I hereby certify that on June 8, 2015, I caused a copy of the foregoing to be filed with the Court's CM/ECF system, which provides service via electronic mail on the following counsel of record:

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/s/ Bary L. Gassman